

Commonwealth Of Massachusetts 56

Suffolk, S.S.

Superior Court  
Department Of The  
Trial Court  
Civil Action  
No. 10-0977-F

Michael A. Josey,  
Plaintiff,

VS.

Commonwealth Of Massachusetts  
Defendant.

Motion To Amend Complaint

Now comes the  
Plaintiff, Michael A. Josey,  
Pro-se, in the above entitled  
action and moves that this

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Court Amend To The Complaint  
the following Motion To Amend  
Complaint & Amended Complaint.

### I. Jurisdiction:

Jurisdiction of this  
Court is invoked pursuant to  
M.G.L. ch. 258D §1, and a  
negligence claim. The effective  
date of M.G.L. ch. 258D §1  
is December 30, 2004. Suffolk  
Superior Court Civil Action  
Number 10-0977-F was filed  
in March of 2010 and statute  
is six years, therefore  
the case is still open.

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## II. Facts:

The Plaintiff, Michael A. Josey, was brought into Roxbury District Court and charged with (Arson) a fire on Deakard Street under M.G.L. ch. 266 §1 and sentenced the sentence was later vacated.

This claim was originally filed in this Court in March of 2010 and is still open it's within the six year statute. The door can't be closed on Justice. Justice Denied is no justice.

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### III. Cause Of Action:

#### Negligence Claim:

Donovan V. Morris, 914 N.E.  
2d 891, 455 Mass. 215 (2009),  
Sullivan V. Iantosca, 569 N.E.  
2d 822, 409 Mass. 796 (1991),  
Parent V. Stone & Webster  
Engineering, 556 N.E. 2d 1009,  
408 Mass. 108 (1990)

### IV. Prayer For Relief:

Wherefore, the Plaintiff  
prays for Relief as requested  
in the original complaint, and  
any other relief this Court  
might deem just proper and

in the best interest of  
Justice.

Respectfully Submitted,

15/ Michael A. Josey

Michael A. Josey

P.O. Box 120242

Boston, MA 02112

Date: January —, 2020